

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Alexandria Division

UNITED STATES OF AMERICA,	)	
	)	
v.	)	
	)	
REAL PROPERTY AND	)	Case No. 1:20-cv-613
IMPROVEMENTS KNOWN AS	)	
35 QUEENSLAND LANE NORTH,	)	
PLYMOUTH, MINNESOTA 55447,	)	
	)	
Defendant in rem.	)	

**STIPULATION FOR SETTLEMENT AND JOINT MOTION FOR ENTRY OF A  
CONSENT ORDER OF SETTLEMENT**

WHEREAS, on June 1, 2020, the United States filed the instant action, a civil complaint for forfeiture in rem, against the property listed in the case caption above (“subject property”);

AND WHEREAS, the government subsequently sent direct notice of this forfeiture action with respect to the subject property to all known potential claimants who may have had an interest in the subject property, including claimant Casey Kirschner;

AND WHEREAS, on July 6, 2020, claimant Casey Kirschner filed a claim asserting an ownership interest in the subject property;

AND WHEREAS, on October 20, 2020, the parties filed a joint motion for an interlocutory sale of the subject property, which the Court granted;

AND WHEREAS, the subject property subsequently sold with net sales proceeds of \$1,400,000;

AND WHEREAS, pursuant to the Court's order of June 9, 2022, \$800,000 of the aforementioned \$1,400,000 has been returned to claimant Casey Kirschner;

AND WHEREAS, the parties now desire to settle this action without further litigation or expense;

NOW THEREFORE, the United States and the claimant, through their respective counsel, hereby agree and stipulate to settle this action as follows:

1. The United States agrees to return to the Claimant the remaining \$600,000 of the subject property.
2. The parties each agree to bear their own costs, to include attorney's fees.
3. The Claimant warrants that he has the legal authority to comply with the terms of this settlement and agrees to execute any and all documents necessary and to take all steps necessary to effectuate the intent of this settlement.
4. The Claimant hereby releases, forever discharges, and holds harmless the United States of America and their agencies, officers, attorneys, agents, servants, employees, successors and assigns from any and all claims, demands, damages, causes of action or suits, of whatever kind and description, and wheresoever situated, which it and its assigns, or any third party ever had, now have, or may have in the future in connection with the investigation into, encumbering of, seizure of, interlocutory sale of, and forfeiture of the subject property.
5. The parties hereby move the Court for the entry of the attached consent settlement order.

Respectfully submitted,

JESSICA D. ABER  
UNITED STATES ATTORNEY

By: /s/ Kevin Hudson  
Kevin Hudson  
Assistant United States Attorney  
Attorney for the United States  
721 Lakefront Commons, Suite 300  
Newport News, VA 23606  
Office Number: (757) 591-4000  
Email Address: kevin.hudson@usdoj.gov

CASEY KIRSCHNER  
CLAIMANT

By: /s/<sup>1</sup>  
J.D. Thomas  
Counsel for Casey Kirschner  
Barnes & Thornburg LLP  
827 19<sup>th</sup> Avenue, Suite 930  
Nashville, Tennessee 37203  
Office Number: (615) 852-6446  
Email Address: [jd.thomas@wallerlaw.com](mailto:jd.thomas@wallerlaw.com)

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<sup>1</sup> Signed with permission given via e-mail at 3:54pm on May 19, 2023.

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 19th day of May, 2023, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will send a notification of the filing (NEF) to all counsel of record.

By: /s/ Kevin Hudson  
Kevin Hudson  
Assistant United States Attorney  
Virginia State Bar No. 81420  
Attorney for the United States  
721 Lakefront Commons, Suite 300  
Newport News, VA 23606  
Office Number: (757) 591-4000  
Facsimile Number: (757) 591-0866  
Email Address: [kevin.hudson@usdoj.gov](mailto:kevin.hudson@usdoj.gov)